

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of	)	
	)	
Connect America Fund	)	WC Docket No. 10-90
	)	
ETC Annual Reports & Certifications	)	WC Docket No. 14-48
	)	
Developing a Unified Intercarrier Compensation	)	CC Docket No. 01-92
Regime	)	

**STEELVILLE TELEPHONE EXCHANGE, INC.  
PETITION FOR WAIVER OF PROCEDURAL RULE**

**Declaration of David C. Blessing**

**Statement of Qualifications**

1. I have over twenty-seven years of experience in the area of economic and financial analysis.

For the last twenty-three years I have been a principal in the economic consulting firm Parrish, Blessing & Associates, Inc. Our firm provides economic, financial and management consulting services primarily to regulated utilities and telecommunications companies in the continental United States and U.S. territories. Prior to this experience I held the position of Senior Economist at Rochester Telephone Corporation. While at Rochester Tel and in my current position, I have testified as an expert witness in several proceedings before state and federal courts, the Federal Communications Commission ("FCC") and several state regulatory commissions on regulatory matters, as well as on the calculation of economic damages for class action suits and employment disputes. My professional background also includes an appointment to the faculty of Nazareth College of Rochester, where I taught courses in economics and finance. I hold a Bachelor of Arts degree from Kalamazoo College and a Master of Arts degree in Economics from Fordham University. In addition, I have

successfully completed all required course work and comprehensive exams for my doctorate in economics.

### **Purpose and Summary**

2. The purpose of this declaration is to confirm that Steelville Telephone Exchange (“STE”) meets the eligibility criterion of the Commission 90% rule when corrected Form 477 data is used to determine the percentage of locations within its serving area with broadband availability. STE currently is able to provide approximately 33.7 percent of the locations within its serving area with broadband service in excess of download speeds of 10 Mbps and upload speeds of 1 Mbps. As a result, Steelville is eligible for A-CAM model-based support because it currently serves less than 90 percent of its locations at speeds of 10/1.<sup>1</sup>

### **Steelville Telephone Exchange Currently Serves Approximately 33.7% of the Locations in Its Service Area With 10/1 Broadband Service**

3. As explained in the Steelville Telephone Exchange Petition for Waiver, the Company has been working with the Wireline Competition Bureau to correct the Form 477 data to include the correct census blocks and broadband offerings. The Company filed corrected data on August 17, 2016. Unfortunately, based on the previous, incorrect data, the Commission did not offer A-CAM model-based support to Steelville on August 3, 2016 because the incorrect data showed that 10/1 broadband was available to more than 90 percent of locations in Steelville. Analyzing the revised data shows that Steelville currently has broadband at 10/1

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<sup>1</sup> *Connect America Fund, ETC Annual Reports and Certifications, Developing a Unified Intercarrier Compensation Regime*, Report & Order, Order, Order on Reconsideration, and Further Notice of Proposed Rulemaking, 31 FCC Rcd 3087, ¶20 *et seq.* (2016) (the “A-CAM Order”) at ¶66.

available to 33.7% of the total locations within its service area boundaries and therefore should be eligible for A-CAM-based support. Steelville's service area contains 5,125 locations covering 1,193 census blocks. Eliminating those census blocks without any locations listed for Steelville leaves 567. Of those census blocks only 109 have 10/1 broadband available to 1,727 locations. These results show that Steelville, with 10/1 broadband available to 33.7% of its locations, does not trigger the 90% eligibility trigger and retains its eligibility for model-based support under the A-CAM. These results are summarized on the table below. The underlying data by census block may be found in the attachment to this declaration.<sup>2</sup>

STE Locations Served at 10/1		
	Census Blocks	Locations
Total STE	567	5,125
Served at >= 10/1	109	1,727
% >= 10/1	13.16%	33.70%

/s/

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September 12, 2016

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<sup>2</sup> The attachment contains data that is covered under the Second Protective Order in WC 10-90. It is redacted in its entirety in the public version of this filing.